

EXHIBIT D

Invoice for Environmental, Billing Matter 3

STEVENS & LEE

P. O. BOX 679

READING, PA 19603-0679

PHONE: 610-478-2000 FAX: 610-376-5610

FEDERAL I.D. #23-1886296

October 17, 2017

Billed through 12/31/16

Invoice Number: 492655 NFK

LEE E BUCHWALD TRUSTEE
 BUCHWALD CAPITAL ADVISORS LLC
 420 LEXINGTON AVENUE SUITE 300
 NEW YORK NY 10170

MAGNESIUM CORP./ENVIRONMENTAL	070187-00003
-------------------------------	--------------

Balance Forward	\$62,525.77
Payments and Adjustments made since last invoice	(\$49,752.17)
Net Balance Forward	\$12,773.60

FOR PROFESSIONAL SERVICES RENDERED:

10/04/16 NFK MSG AND EMAILS PARSELLS RE STATUS

	0.10 hrs.	890 /hr.	89.00
10/05/16 NFK CONF LPG RE COVERAGE	0.10 hrs.	890 /hr.	89.00
TOTAL FEES	0.20 hrs.		\$178.00

BILLING SUMMARY

TOTAL FEES	\$178.00
TOTAL EXPENSES	\$0.00
TOTAL OF THIS BILL	\$178.00
NET BALANCE FORWARD	\$12,773.60
TOTAL BALANCE DUE	\$12,951.60

STEVENS & LEE
P. O. BOX 679
READING, PA 19603-0679
PHONE: 610-478-2000 FAX: 610-376-5610
FEDERAL I.D. #23-1886296

October 17, 2017
Billed through 12/31/16

Invoice Number: 492655 NFK

LEE E BUCHWALD TRUSTEE
BUCHWALD CAPITAL ADVISORS LLC
420 LEXINGTON AVENUE SUITE 300
NEW YORK NY 10170

MAGNESIUM CORP./ENVIRONMENTAL 070187-00003

Balance Forward	\$62,525.77
Payments and Adjustments made since last invoice	(\$49,752.17)
Net Balance Forward	\$12,773.60

BILLING SUMMARY

TOTAL FEES	\$178.00
TOTAL EXPENSES	\$0.00
TOTAL OF THIS BILL	\$178.00
NET BALANCE FORWARD	\$12,773.60
TOTAL BALANCE DUE	\$12,951.60

STEVENS & LEE

P. O. BOX 679

READING, PA 19603-0679

PHONE: 610-478-2000 FAX: 610-376-5610

FEDERAL I.D. #23-1886296

October 17, 2017

Billed through 09/30/17

Invoice Number: 492661 NFK

LEE E BUCHWALD TRUSTEE
 BUCHWALD CAPITAL ADVISORS LLC
 420 LEXINGTON AVENUE SUITE 300
 NEW YORK NY 10170

MAGNESIUM CORP./ENVIRONMENTAL	070187-00003
-------------------------------	--------------

Balance Forward	\$12,951.60
Payments and Adjustments made since last invoice	\$0.00
Net Balance Forward	\$12,951.60

FOR PROFESSIONAL SERVICES RENDERED:

01/09/17 NFK REVIEW 11/24 ARTICLE ON EPA ROWLEY UPDATE
 AND EMAILS BUCHWALD

0.30 hrs.	910 /hr.	273.00
-----------	----------	--------

02/06/17 NFK EMAILS AND TEL BUCHWALD RE EPA CLAIM,
 ENVIRONMENTAL CONSULTANTS

0.10 hrs.	910 /hr.	91.00
-----------	----------	-------

02/07/17 NFK EMAIL REYHER ET AL RE ROSNER LETTER TO MKV
 ON ENVIRONMENTAL CLAIMS, POC TIMING

0.50 hrs.	910 /hr.	455.00
-----------	----------	--------

02/21/17 NFK EMAILS POSCABLO, CP AND BUCHWALD RE EPA
 CLAIM, ADMIN BAR DATE

0.30 hrs.	910 /hr.	273.00
-----------	----------	--------

02/22/17 NFK EMAILS POSCABLO AND BUCHWALD RE EXT OF
 CLAIMS BAR DATE FOR DOJ

0.20 hrs.	910 /hr.	182.00
-----------	----------	--------

02/23/17 NFK REVIEW STIPULATION EXT BAR DATE FOR EPA AND
 UTAH AND EMAILS POSCABLO AND BUCHWALD

0.30 hrs.	910 /hr.	273.00
-----------	----------	--------

02/26/17 NFK EMAILS BUCHWALD RE EPA BAR DATE

0.10 hrs.	910 /hr.	91.00
-----------	----------	-------

02/27/17 NFK EMAILS POSCABLO RE POC EXT STIP

0.10 hrs.	910 /hr.	91.00
-----------	----------	-------

02/28/17	NFK	REVIEW STIP EXT EPA BAR DATE AND EMAILS BUCHWALD AND POSCABLO	0.10 hrs.	910 /hr.	91.00
03/01/17	NFK	REVIEW RENCO GROUP, IRA RENNERT AND US MAG CLAIMS FOR ENVIRONMENTAL REIMBURSEMENT AND EMAILS DOJ, BUCHWALD ET AL	0.60 hrs.	910 /hr.	546.00
03/14/17	NFK	EMAILS DOJ AND BUCHWALD RE BAR DATE	0.20 hrs.	910 /hr.	182.00
03/15/17	CP	REVIEW UTAH STATE DEPARTMENT OF ENVIRONMENTAL QUALITY & NATURAL RESOURCES PROOFS OF CLAIM, UPDATE CLAIMS ANALYSIS CHARTS (0.6) - REVIEW EPA, DOI, BLM, FWS PROOFS OF CLAIM, UPDATE CLAIMS ANALYSIS CHARTS (0.6)	1.20 hrs.	650 /hr.	780.00
03/15/17	NFK	EMAILS BUCHWALD RE ENVIRONMENTAL CLAIMS DEADLINE (0.1) - REVIEW UTAH AND DOJ POC'S (0.6) - EMAILS BUCHWALD RE SAME, EFFECT ON DISTRIB (0.3)	1.00 hrs.	910 /hr.	910.00
03/17/17	NFK	REVIEW UTAH POC'S AND EMAILS BUCHWALD	0.20 hrs.	910 /hr.	182.00
03/23/17	CP	REVIEW/COMPARE NEW EPA PROOFS OF CLAIMS W/ PRIOR CLAIMS WHICH EPA SAYS ARE SEPARATE & DISTINCT	1.00 hrs.	650 /hr.	650.00
03/27/17	NFK	ATTN TO ENVIRONMENTAL CLAIMS	0.50 hrs.	910 /hr.	455.00
03/28/17	NFK	REVIEW/ANALYZE EPA POC'S AND MEMO TO DOJ REQUESTING BACK-UP DOCS AND INFO (2.2) - EMAILS BUCHWALD RE SAME AND FINALIZE MEMO (0.5)	2.70 hrs.	910 /hr.	2,457.00
03/29/17	NFK	EMAILS POSCABLO AND BUCHWALD RE STATUS	0.10 hrs.	910 /hr.	91.00
03/30/17	NFK	TELS POSCABLO AND BUCHWALD RE EPA CLAIMS, STLMT, RENCO APPEAL AND POSSIBLE NEXT STEPS	0.80 hrs.	910 /hr.	728.00
04/10/17	NFK	EMAILS BUCHWALD [REDACTED] [REDACTED]	0.40 hrs.	910 /hr.	364.00

04/25/17	NFK	EMAILS DOJ RE RENCO GROUP POSITION ON ALLOCATION OF RECOVERIES BETWEEN ESTATES AND TREATMENT OF EPA CLAIM, DOCS, GLOBAL STLMT (0.8) - ATTN TO STRATEGY, EXPERT (0.4) - REVIEW DOUG ALLEN ENVIRONMENTAL REPORT AND EMAILS BUCHWALD (0.3) - TEL BUCHWALD RE SAME (0.4) - EMAILS ALLEN, PARSELLS AND STIRLING RE ENVIRONMENTAL EXPERT (1.0) - CONF AND EMAILS JF AND EMAILS BUCHWALD RE ALLEN TRIAL AND DEPO TESTIMONY (0.2)	3.10 hrs.	910 /hr.	2,821.00
04/25/17	DJP	RESPOND TO REQUEST FOR RECOMMENDATION OF EXPERT TO CLIENT RE ENVIRONMENTAL COST ISSUES, INCLUDING ISSUE REVIEW AND CONTACT TO POTENTIAL EXPERT FIRM RE SPECIFIC EXPERTISE FOR CLIENT USE IN RESPONSE TO LARGE EPA COST CLAIMS	0.50 hrs.	845 /hr.	422.50
04/26/17	NFK	EMAILS ALLEN, STIRLING, BUCHWALD, PARSELLS RE ENVIRONMENTAL EXPERT (1.4) - TEL BUCHWALD RE SAME (0.2) - REVIEW KURT HERMAN WEB BIO AND EMAILS W/ BUCHWALD (0.3) - DRAFT INTRODUCTORY EMAIL TO HERMAN RE ENVIRONMENTAL CONSULTING SERVICES (1.2)	3.10 hrs.	910 /hr.	2,821.00
04/26/17	DJP	FOLLOW UP COMMUNICATIONS EXPERT AND REVIEW BIO FOR RESPONSE TO CLIENT AND N KAJON RE REQUEST FOR RECOMMENDATION OF EXPERT TO CLIENT RE ENVIRONMENTAL COST, INCLUDING COMMUNICATIONS EXPERT AND PREPARATION OF EMAIL RE POTENTIAL COST EXPERT, BIO, AREAS OF EXPERTISE	0.80 hrs.	845 /hr.	676.00
04/26/17	DJP	RECEIPT AND REVIEW, FORWARD ADDITIONAL EXPERT MATERIALS FOR CLIENT REVIEW	0.50 hrs.	845 /hr.	422.50
04/27/17	NFK	REVIEW HERMAN AND VERSLYCKE QUALIFICATIONS (0.4) - EMAILS HERMAN AND BUCHWALD RE SAME (0.2) - 2 TELS BUCHWALD RE SAME (0.4) - REVIEW FILE AND EMAIL STIRLING RE ENVIRONMENTAL DOCS FOR CONSULTANTS (1.5) - REVIEW STIRLING EMAIL AND VAILLANCOURT QUALIFICATIONS (0.2) - EMAILS VAILLANCOURT AND BUCHWALD RE SAME (0.3) - EMAILS HERMAN ET AL RE GARDIENT CONFLICT (0.5)	3.50 hrs.	910 /hr.	3,185.00
04/27/17	DJP	EVALUATE AND RESEARCH ENVIRONMENTAL LEGAL ISSUES FOR REQUESTED PARTICIPATION IN MEETING WITH ENVIRONMENTAL CONSULTANTS AND CLIENT [REDACTED] [REDACTED]	2.00 hrs.	845 /hr.	1,690.00

04/27/17	DJP	RECEIPT AND REVIEW ADDITIONAL INFORMATION REGARDING POTENTIAL EXPERTS, INCLUDING NEWLY PROPOSED ADDITIONAL GRADIENT SCIENTIST QUALIFICATIONS AND BACKGROUND	0.10 hrs.	845 /hr.	84.50
04/28/17	NFK	EMAILS HERMAN ET AL RE GRADIENT CONFLICT, RECOMMENDATIONS (0.2) - EMAILS VAILLANCOURT OF JOHNSON AND BUCHWALD RE QUALIFICATIONS, CONFLICT (0.2) - REVIEW QUALIFICATIONS OF RAM AND SIMON (0.3) - EMAILS BUCHWALD RE SAME (0.1)	0.80 hrs.	910 /hr.	728.00
04/28/17	CP	RESEARCH RE: CONFLICT OF INTEREST/RETENTION OF ENVIRONMENTAL EXPERT, EMAIL MEMO TO NFK RE: SAME	3.40 hrs.	650 /hr.	2,210.00
04/28/17	NFK	EMAILS BUCHWALD, RAM, SIMONS, PARSELLS, EMR, CP ET AL RE EXPERTS	1.80 hrs.	910 /hr.	1,638.00
04/28/17	DJP	COMMUNICATIONS REGARDING VARIOUS EXPERTS, AND REVIEW FOR ADDITIONAL POTENTIAL EXPERTS REGARDING COSTS AND RELATED ENVIRONMENTAL EXPERIENCE AND QUALIFICATIONS	1.50 hrs.	845 /hr.	1,267.50
05/01/17	DJP	REVIEW ENVIRONMENTAL DOCUMENTS FROM CASE AND ISSUES, POTENTIAL EXPERTS	1.00 hrs.	845 /hr.	845.00
05/01/17	NFK	REVIEW RAM QUALIFICATIONS AND EMAILS BUCHWALD, RAM, PARSELLS, ET AL RE INTERVIEW (1.4) - PREP ROUX MTG (0.8) - EMAILS POSCABLO ET AL RE BACK-UP INFO AND DOCS (0.1) - EMAILS SIMON ET AL RE GNARUS (0.1)	2.40 hrs.	910 /hr.	2,184.00
05/01/17	DJP	REVIEW AND ANALYSIS INFORMATION RE ROUX AND EXPERTS, FOR MEETING PREPARATION, RE MEETING AT ROUX	0.90 hrs.	845 /hr.	760.50
05/01/17	DJP	REVIEW OF ISSUES FOR MEETING WITH EXPERTS	2.20 hrs.	845 /hr.	1,859.00
05/02/17	NFK	REVIEW PRETRIAL ORDER AND EMAIL RAM ET AL RE MAGNESIUM MANUFACTURING PROCESSES, REGULATORY HISTORY (0.4) - CONF BUCHWALD RE ENVIRONMENTAL ISSUES, ROUX ASSOCIATES INTERVIEW (0.2) - REVIEW FILE AND PREP FOR ROUX ASSOCIATES MTG (0.6) - EMAILS RAM ET AL RE ALLEN EXPERT REPORT (0.2)	1.40 hrs.	910 /hr.	1,274.00

05/02/17	NFK	TRAVEL TO BOSTON WITH BUCHWALD AND DISCUSS ENVIRONMENTAL CLAIMS (4.5) - MEETINGS IN BOSTON WITH BUCHWALD AND PARSELLS TO DISCUSS ENVIRONMENTAL CLAIMS, EXPERTS (3.5)	8.00 hrs.	910 /hr.	7,280.00
05/02/17	DJP	TRAVEL KING OF PRUSSIA PA TO BOSTON FOR MEETING WITH CLIENT AND CO-COUNSEL AND DISCUSSION OF, PREPARATION FOR INTERVIEW WITH AND DETAILED DISCUSSION OF COST ESTIMATION ISSUES FOR ENVIRONMENTAL ANALYSIS OF US AND OTHER CLAIMS FOR MULTI-MILLION REMEDIAL ACTION RELATED COSTS AND EXPENSES [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		REVIEW QUALIFICATIONS OF AND DOCUMENTS PROVIDED FOR AND BY MULTIPLE ENVIRONMENTAL SCIENTIST REPRESENTATIVES OF ROUX FIRM	7.40 hrs.	845 /hr.	6,253.00
05/03/17	CP	RESEARCH RE: ENVIRONMENTAL EXPERT	0.50 hrs.	650 /hr.	325.00
05/03/17	NFK	MTG AT ROUX HQ W/ RAM AND HIS TEAM, BUCHWALD AND PARSELLS TO DISC RETENTION, ENVIRONMENTAL CLAIMS (3.8) - RETURN TO NYC W/ BUCHWALD AND PARSELLS, DISC ROUX RETENTION AND ENVIRONMENTAL ISSUES, EMAILS W/ RAM AND REVIEW DOCS FWD BY RAM RE QUALIFICATIONS (5.7)	9.50 hrs.	910 /hr.	8,645.00
05/03/17	DJP	MEETING WITH CLIENT AND MULTIPLE ENVIRONMENTAL SCIENTIST REPRESENTATIVES OF ROUX FIRM CANDIDATE FOR EXPERT CONSULTING TO CLIENT, AND EXTENSIVE INTERVIEW AND DISCUSSION OF MULTIPLE ISSUES REGARDING SITE, BACKGROUND, EXPERTISE, INCLUDING RECEIPT AND REVIEW OF VOLUMINOUS DOCUMENTATION REGARDING OTHER SITES, DAUBERT CHALLENGES TO TESTIMONY, ANALYSIS OF SAME, FOR ASSISTANCE TO CLIENT REGARDING POTENTIAL RETENTION OF EXPERT, INCLUDING RETURN TRAVEL FROM BOSTON	10.50 hrs.	845 /hr.	8,872.50
05/04/17	CP	MEETING W/ NFK RE: RETENTION OF ROUX/NEIL RAM (0.4) - BEGIN REVIEW OF ROUX DOCUMENTS, RESEARCH MONTHLY FEE ORDERS FOR RETAINED CONSULTANTS (1.5)	1.90 hrs.	650 /hr.	1,235.00

05/04/17	DJP	REVIEW AND ANALYSIS OF FURTHER DOCUMENTATION PROVIDED BY CANDIDATE FOR ENVIRONMENTAL EXPERT REPRESENTATION OF TRUSTEE, AND CONFER CO-COUNSEL RE SAME AND RE EXPERT FEES	1.70 hrs.	845 /hr.	1,436.50
05/04/17	NFK	ATTN TO ROUX RETENTION, SCOPE OF WORK (1.2) - EMAILS RAM, BUCHWALD ET AL RE ROUX QUALIFICATIONS, RETENTION, SCOPE OF WORK (1.2) - EMAILS STIRLING, RAM ET AL RE DOCS FOR ENVIRONMENTAL CONSULTANT (0.5) - CONF CP RE RETENTION OF ENVIRONMENTAL CONSULTANTS, LIKELY OBJS, STRATEGY (0.3) - FOLLOW-UP EMAILS W/ CP (0.1) - TEL MACY (CFO OF ROUX) RE RETENTION AND PAYMENT ISSUES (0.2) - TEL BUCHWALD RE ROUX, SITE VISIT (0.3) - TEL DJP RE RAM QUALIFICATIONS, SUPERFUND (0.1)	3.90 hrs.	910 /hr.	3,549.00
05/05/17	CP	DRAFT MOTION TO RETAIN ROUX ASSOCIATES AS ENVIRONMENTAL CLAIMS CONSULTANTS	4.40 hrs.	650 /hr.	2,860.00
05/07/17	CP	REVISE MOTION TO RETAIN ROUX ASSOCIATE & EMAIL TO NFK	1.70 hrs.	650 /hr.	1,105.00
05/07/17	NFK	EMAILS CP RE MOTION TO RETAIN ROUX ASSOCIATES	0.10 hrs.	910 /hr.	91.00
05/08/17	NFK	EMAILS CP RE ROUX RETENTION AGMT (0.1) - REVIEW/REVISE APP RETAIN ROUX ASSOCIATES AS ENVIRONMENTAL CLAIMS CONSULTANTS AND BUCHWALD AND RAM DECS IN SUPPORT (2.4) - CONF AND EMAILS CP RE SAME (0.1)	2.60 hrs.	910 /hr.	2,366.00
05/08/17	CP	REVISE ROUX ASSOCIATES RETENTION AGREEMENT, EMAILS W/ NFK RE: SAME	1.80 hrs.	650 /hr.	1,170.00
05/09/17	CP	EMAILS W/ ROUX RE: RETENTION APPLICATION, REVIEW OF CREDITORS FOR POTENTIAL CONFLICTS/DISCLOSURES (0.3) - EMAILS W/ NFK, LEB, DJP RE: DR. RAM DECLARATION, MOTION TO RETAIN ROUX ASSOCIATES (0.3)	0.60 hrs.	650 /hr.	390.00
05/09/17	DJP	RECEIPT AND REVIEW EMAILS RE ADDITIONAL CONFLICT CHECKS AND REVIEW STATUS	0.10 hrs.	845 /hr.	84.50

05/09/17	DJP	RECEIPT AND ANALYSIS OF DRAFT COURT FILINGS, INCLUDING REQUEST FOR APPROVAL OF EXPERT ENVIRONMENTAL CONSULTANT TO EVALUATE ENVIRONMENTAL CLAIMS, REVIEW OTHER CASE DOCUMENTS, DECLARATION DRAFT OF N RAM, AND RESEARCH [REDACTED]	2.30 hrs.	845 /hr.	1,943.50
		AND DRAFT ADDITIONAL LANGUAGE FOR INCLUSION IN COURT SUBMISSION SEEKING COURT APPROVAL OF RETENTION BY TRUSTEE OF N. RAM			
05/09/17	NFK	EMAILS RAM, STIRLING ET AL RE ENVIRONMENTAL DOCS (0.1) - EMAILS RAM RE CONNECTIONS (0.4) - CONTINUE WORKING ON ROUX RETENTION APP AND DECS (2.4) - CONF CP RE SAME, RETENTION AGMT (0.1) - TEL EMR RE RAM, GOODWIN (0.1) - EMAILS BUCHWALD ET AL RE RETENTION PAPERS (0.3) - TEL BUCHWALD RE SAME (0.4) - FURTHER EDITS TO ROUX RETENTION APP AND DECS (1.0)	4.80 hrs.	910 /hr.	4,368.00
05/10/17	DJP	REVIEW COMMUNICATIONS RE EXPERT RETENTION	0.10 hrs.	845 /hr.	84.50
05/10/17	NFK	2 TELS RAM RE RETENTION, BUDGET, SERVICES (0.6) - REVIEW/REVISE ROUX RETENTION PAPERS (1.0) - REVIEW ENVIRONMENTAL DOCS, RAM QUALIFICATIONS (0.6) - EMAILS DJP, STIRLING, RAM ET AL RE ENVIRONMENTAL DOCS (0.8) - CONF CP RE ROUX (0.1) - EMAILS RAM ET AL RE ROUX RETENTION PAPERS (0.3) - REVIEW/REVISE ROUX PROFESSIONAL SERVICES AGREEMENT (1.0) - EMAILS BUCHWALD, RAM ET AL RE SAME (0.3) - TEL BUCHWALD RE ROUX, BUDGET, STRATEGY (0.4)	5.10 hrs.	910 /hr.	4,641.00
05/11/17	DJP	COMMUNICATIONS RE EXPERT RETENTION DETAILS, REVIEW PRIOR PROVIDED INFORMATION AND SUGGEST ADDITIONS TO SCOPE OF ENVIRONMENTAL CONSULTANT WORK	0.80 hrs.	845 /hr.	676.00
05/11/17	NFK	EMAILS RAM ET AL RE VERANTH REPORT, SITE VISIT (0.2) - REVIEW ENVIRONMENTAL DOCS AND EMAILS SULEJMANI, BUCHWALD (0.4) - EMAILS RAM ET AL RE RETENTION APP (0.4) - REVIEW/REVISE RETENTION APP (0.6) - REVIEW ROUX PROJECT TASK LIST AND EMAILS RAM ET AL (1.1) - ATTN TO STRATEGY (0.3)	3.00 hrs.	910 /hr.	2,730.00

05/12/17	DJP	MULTIPLE COMMUNICATIONS CO-COUNSEL [REDACTED] [REDACTED] AND FOLLOW UP REVIEW OF DOJ CLAIMS, CERCLA, RCRA, DRAFT EMAIL TO CO-COUNSEL [REDACTED] [REDACTED] AND ADDITIONAL SUGGESTION RE MOTION LANGUAGE RE EXPERT RETENTION [REDACTED] [REDACTED] REVIEW STATUS RE PENDING ISSUES	2.00 hrs.	845 /hr.	1,690.00
05/12/17	NFK	EMAILS RAM ET AL RE BUDGET (0.1) - ATTN TO ROUX RETENTION, ENVIRONMENTAL CLAIMS (0.6) - EMAILS PARSELLS [REDACTED] (0.4)	1.10 hrs.	910 /hr.	1,001.00
05/13/17	CP	EMAILS W/ ROUX RE: RETENTION AGREEMENT	0.10 hrs.	650 /hr.	65.00
05/13/17	NFK	REVIEW/ANALYZE RAM EMAIL AND EPA PRESENTATION ON ROWLEY SITE FEATURES AND EMAILS W/ RAM RE DOC REQUEST FOR DOJ (0.8) - REVIEW BUCHWALD EMAIL RE ROUX BUDGET (0.1)	0.90 hrs.	910 /hr.	819.00
05/15/17	NFK	ATTN TO ROUX RETENTION AND EMAILS W/ BUCHWALD	0.40 hrs.	910 /hr.	364.00
05/16/17	CP	REVIEW ROUX ASSOCIATES PROJECT COSTS ESTIMATES	0.30 hrs.	650 /hr.	195.00
05/16/17	DJP	PREPARE FOR AND PARTICIPATE IN CONFERENCE CALL CLIENT AND EXPERT RAM AND ANALYSIS OF DETAILED COST ESTIMATES FOR ENVIRONMENTAL WORK, FOLLOWED BY COMMUNICATIONS CLIENT AND REVIEW ISSUES FOR, PREPARE FOLLOW QUESTIONS TO N RAM REGARDING COST ESTIMATE COMPONENTS AND CONTINGENCIES	0.90 hrs.	845 /hr.	760.50
05/16/17	NFK	REVIEW/REVISE ROUX RETENTION AGREEMENT AND RAM DEC AND EMAILS RAM ET AL (0.8) - TELEPHONE CONFERENCE/DISC WITH RAM, NEVINS, BUCHWALD, DJP RE ROUX RETENTION, WORK PLAN, BUDGET (0.5) - TELEPHONE CONFERENCE/DISC WITH BUCHWALD, DJP RE SAME (0.3) - FOLLOW-UP EMAILS WITH BUCHWALD, DJP (0.1)	1.70 hrs.	910 /hr.	1,547.00
05/16/17	DJP	RECEIPT AND REVIEW OF DETAILED RESPONSE FROM EXPERT REGARDING POTENTIAL COST CONTINGENCIES IN EXPERT BUDGETING, AND PREPARE RESPONSE AND SEPARATE REPORT TO AND ISSUE DISCUSSION TO TRUSTEE	0.40 hrs.	845 /hr.	338.00

05/17/17	CP	EMAILS W/ ROUX ASSOCIATES RE: PROJECT COST ESTIMATES (0.1)	0.10 hrs.	650 /hr.	65.00
05/17/17	DJP	COMMUNICATIONS CLIENT AND EXPERT RE ADJUSTMENT OF BUDGET TO ACCOUNT FOR CONTINGENCIES	0.20 hrs.	845 /hr.	169.00
05/17/17	DJP	COMMUNICATIONS EXPERT AND CLIENT REGARDING RESPONSE TO OUR QUESTIONS REGARDING UNCERTAINTIES AND CONTINGENCIES IN INITIAL BUDGET, POTENTIAL REVISIONS PER SAME	0.40 hrs.	845 /hr.	338.00
05/17/17	DJP	RECEIPT AND REVIEW OF ADDITIONAL COMMUNICATIONS AND PROPOSED FILINGS REGARDING COURT FILING DRAFTS RELATED TO EXPERT RETENTION, US TRUSTEE COMMENTS, AND FOLLOW UP CO-COUNSEL RE SCOPE OF CURRENT ENVIRONMENTAL CLAIMS [REDACTED]	0.50 hrs.	845 /hr.	422.50
05/17/17	NFK	EMAILS RAM, BUCHWALD AND DJP RE TASKS, COST ESTIMATE, RETENTION PROCEDURES (0.5) - REVIEW/REVISE ROUX RETENTION PAPERS (0.6) - EMAIL DOJ ET AL RE ROUX RETENTION (0.5) - FOLLOW-UP EMAILS W/ UST ET AL (0.2)	1.80 hrs.	910 /hr.	1,638.00
05/18/17	NFK	CONF BUCHWALD RE ROUX RETENTION, ENVIRONMENTAL CLAIMS (0.3) - EMAILS RAM RE HEARING DATE (0.1)	0.40 hrs.	910 /hr.	364.00
05/19/17	DJP	RECEIPT AND REVIEW OF CORRESPONDENCE FROM N RAM WITH ATTACHED SCREEN SHOTS OF AVAILABLE DOCUMENTS FROM CASE FOR POTENTIAL REVIEW	0.10 hrs.	845 /hr.	84.50
05/19/17	NFK	REVIEW RAM EMAIL RE DOC REVIEW	0.10 hrs.	910 /hr.	91.00
05/22/17	NFK	EMAILS BUCHWALD RE DOCS FOR ROUX (0.1) - EMAILS RAM RE 5/24 MTG (0.1) - TEL RICE RE ENVIRONMENTAL CLAIMS, ANALYSIS, EXPERTS (0.2) - TEL BUCHWALD RE SAME (0.1) - REVIEW/ANALYZE EXPERT REPORTS AND OTHER ENVIRONMENTAL DOCS AND EMAIL TO RAM ET AL RE SCOPE OF DOC REVIEW (2.0)	2.50 hrs.	910 /hr.	2,275.00
05/23/17	NFK	EMAILS RAM RE DOCS	0.10 hrs.	910 /hr.	91.00

05/24/17	CP	ATTN TO SERVICE & FILING OF MOTION TO RETAIN ROUX ASSOCIATES AS ENVIRONMENTAL CLAIMS CONSULTANTS	0.80 hrs.	650 /hr.	520.00
05/24/17	NFK	EMAILS CP RE ROUX RETENTION PAPERS (0.1) - MTG RAM AND NEVINS TO DISC ROUX RETENTION, SITE VISIT (0.3) - REVIEW/ANALYZE ENVIRONMENTAL CLAIMS AND REVIEW/REVISE ROUX RETENTION PAPERS (1.5) - EMAILS DOJ ET AL RE ROUX RETENTION PAPERS (0.3)	2.20 hrs.	910 /hr.	2,002.00
05/25/17	CP	FINALIZE MOTION TO RETAIN ROUX ASSOCIATES AS ENVIRONMENTAL CLAIMS CONSULTANTS, FILE & SERVE SAME	2.30 hrs.	650 /hr.	1,495.00
05/25/17	DJP	REVIEW MULTIPLE RECENT COMMUNICATIONS AND ISSUES REGARDING ENVIRONMENTAL EXPERT MOTION AND OTHER EXPERT ISSUES TO BE ADDRESSED	0.20 hrs.	845 /hr.	169.00
05/25/17	NFK	FINALIZE ROUX RETENTION PAPERS AND EMAILS RAM, BUCHWALD AND CP (1.0) - CONF CP RE SAME (0.1) - EMAIL RAM ET AL RE INITIAL WORK (0.5)	1.60 hrs.	910 /hr.	1,456.00
05/26/17	NFK	REVIEW ENVIRONMENTAL DOCS AND ATTN TO ROUX SCOPE OF WORK	1.20 hrs.	910 /hr.	1,092.00
05/30/17	NFK	EMAILS RAM RE SCOPE OF WORK, JURY AWARD, ENVIRONMENTAL CLAIMS (0.2) - REVIEW ENVIRONMENTAL DOCS AND ATTN TO ROUX DUE DILIGENCE (0.6) - EMAILS BUCHWALD RE ROUX DUE DILIGENCE (0.1)	0.90 hrs.	910 /hr.	819.00
05/31/17	NFK	PREP ROUX CONF CALL (0.5) - TELEPHONE CONFERENCE/DISC WITH RAM AND NEVINS RE BACKGROUND, DOC REVIEW, SCOPE (0.6)	1.10 hrs.	910 /hr.	1,001.00
06/01/17	NFK	REVIEW ROUX DOCUMENT REQUESTS AND EMAILS RAM, STIRLING, ET AL (1.5) - EMAILS CP RE ROUX RETENTION (0.1)	1.60 hrs.	910 /hr.	1,456.00
06/02/17	NFK	EMAILS STIRLING ET AL RE DOCS FOR ROUX	0.30 hrs.	910 /hr.	273.00

06/04/17	NFK	EMAILS RAM AND NEVINS RE ALLEN REPORT SUPPORTING DOCS (0.1) - ATTN TO STRATEGY AND EMAILS W/ BUCHWALD (0.4) - EMAIL STIRLING ET AL RE ENVIRONMENTAL DOCS FOR ROUX (0.3)	0.80 hrs.	910 /hr.	728.00
06/05/17	NFK	EMAILS RAM, STIRLING ET AL RE ALLEN EXPERT REPORT SUPPORTING DOCS, DEPOS, OTHER ENVIRONMENTAL DOCS	0.60 hrs.	910 /hr.	546.00
06/06/17	NFK	EMAILS STIRLING ET AL RE POWELL REPORT, OTHER ENVIRONMENTAL DOCS	0.30 hrs.	910 /hr.	273.00
06/08/17	DJP	RECEIPT AND REVIEW OF CORRESPONDENCE FROM N RAM RE DOCUMENT REQUESTS	0.10 hrs.	845 /hr.	84.50
06/08/17	NFK	REVIEW RAM EMAIL RE ADDITIONAL DOCUMENT REQUESTS	0.10 hrs.	910 /hr.	91.00
06/09/17	CP	EMAILS & MEMO FROM ROUX RE: ENVIRONMENTAL CLAIMS ANALYSIS	0.40 hrs.	650 /hr.	260.00
06/10/17	NFK	EMAILS CP RE ROUX RETENTION ORDER	0.10 hrs.	910 /hr.	91.00
06/12/17	CP	EMAILS & MEMO FROM ROUX RE: ENVIRONMENTAL CLAIMS ANALYSIS	0.10 hrs.	650 /hr.	65.00
06/12/17	DJP	RECEIPT AND REVIEW OF COMMUNICATION N RAM RE ADDITIONAL MATERIALS AND SITE VISIT	0.10 hrs.	845 /hr.	84.50
06/12/17	NFK	REVIEW RAM EMAILS RE ADDITIONAL DOCUMENT REQUESTS	0.20 hrs.	910 /hr.	182.00
06/13/17	DJP	REVIEW STATUS AND EMAIL CO-COUNSEL RE DOCUMENT ISSUES	0.20 hrs.	845 /hr.	169.00
06/13/17	NFK	TEL RAM RE DOCS, SITE VISIT (0.4) - ATTN TO ENVIRONMENTAL ISSUES (0.3) - EMAILS PARSELLS RE ENVIRONMENTAL DOCS (0.1)	0.80 hrs.	910 /hr.	728.00
06/14/17	NFK	ATTN TO ENVIRONMENTAL CLAIMS, STRATEGY (0.6) - EMAILS RAM AND STIRLING RE ROUX DOC REQUESTS (0.3) - MSG REYHER (0.1)	1.00 hrs.	910 /hr.	910.00

06/15/17	NFK	REVIEW RAM EMAILS RE POWELL REPORT, EPA'S 17 PRELIMINARY REMEDIATION INVESTIGATION AREAS, AND ATTN TO ENVIRONMENTAL ISSUES	1.00 hrs.	910 /hr.	910.00
06/15/17	DJP	RECEIPT AND REVIEW OF CORRESPONDENCE AND SITE CHARTS FROM N RAM	0.20 hrs.	845 /hr.	169.00
06/16/17	NFK	ATTN TO OPEN ISSUES AND STRATEGY (0.7) - EMAILS BUCHWALD RE SAME, ROUX REVIEW, SITE VISIT (0.3)	1.00 hrs.	910 /hr.	910.00
06/19/17	NFK	ATTN TO ENVIRONMENTAL ISSUES (0.4) - EMAILS REYHER ET AL RE EPA SUPPORTING DOCS, COST ESTIMATES (0.5) - CONF BUCHWALD RE SAME, STRATEGY (0.4)	1.30 hrs.	910 /hr.	1,183.00
06/20/17	NFK	EMAILS RAM ET AL RE MEETING WITH DOJ/EPA	0.40 hrs.	910 /hr.	364.00
06/22/17	CP	REVIEW ROUX LIST OF DOCUMENTS TO REQUEST FROM EPA IN SUPPORT OF THEIR CLAIM	0.30 hrs.	650 /hr.	195.00
06/22/17	NFK	EMAILS RAM, DOJ ET AL RE STLMT MTG, DOCS (0.5) - REVIEW ROUX RETENTION ORDER AND EMAIL RAM (0.1)	0.60 hrs.	910 /hr.	546.00
06/25/17	NFK	EMAILS BUCHWALD RE DOCUMENTS	0.10 hrs.	910 /hr.	91.00
06/26/17	NFK	EMAILS RAM, DOJ ET AL RE DUE DILIGENCE DOCUMENTATION, STLMT MTG	1.40 hrs.	910 /hr.	1,274.00
06/27/17	NFK	TEL REYHER RE STLMT MTG, STAY OF MANDATE (0.1) - EMAILS HULLINGER ET AL RE DOCS FOR ROUX (0.1) - CONF BUCHWALD RE STRATEGY (0.1)	0.30 hrs.	910 /hr.	273.00
06/28/17	NFK	EMAILS RAM ET AL RE DOCS (0.1) - CONF CP RE STATUS (0.1) - MSGS AND TEL RAM RE SUMMARY SHEET, STRATEGY (0.2) - EMAILS DJP ET AL RE 7/13 MTG (0.1)	0.50 hrs.	910 /hr.	455.00
06/28/17	DJP	RECEIPT AND REVIEW [REDACTED]	0.50 hrs.	845 /hr.	422.50

06/29/17	NFK	REVIEW/ANALYZE ENVIRONMENTAL DOCS AND ATTN TO OPEN ISSUES (1.2) - CONFER WITH BUCHWALD RE STRATEGY TO RESOLVE ENVIRONMENTAL CLAIMS, MTGS W/ EPA AND RENCO (0.5)	1.70 hrs.	910 /hr.	1,547.00
06/30/17	NFK	ATTN TO STRATEGY, UPCOMING MTGS (0.8) - MSG FOR AND TEL SHIFF RE MTG (0.2) - EMAILS BUCHWALD RE SAME (0.2)	1.20 hrs.	910 /hr.	1,092.00
07/03/17	NFK	EMAILS BUCHWALD RE DOJ MEETING	0.10 hrs.	910 /hr.	91.00
07/05/17	DJP	RECEIPT AND REVIEW OF CORRESPONDENCE FROM EXPERT RAM	0.10 hrs.	845 /hr.	84.50
07/05/17	NFK	EMAILS RAM ET AL RE DOCS (0.1) - ATTN TO STRATEGY (0.8) - EMAILS DOJ, BUCHWALD ET AL RE MTG (0.3) - TEL BUCHWALD RE SAME (0.2)	1.40 hrs.	910 /hr.	1,274.00
07/06/17	DJP	COMMUNICATION BEUS GILBERT RE PLATES, RAM	0.10 hrs.	845 /hr.	84.50
07/06/17	NFK	EMAILS RAM ET AL RE MTGS (0.1) - EMAILS BUCHWALD RE STATUS (0.1) - REVIEW STIRLING EMAIL RE SITE MAPS (0.1)	0.30 hrs.	910 /hr.	273.00
07/07/17	DJP	COMMUNICATIONS RE MEETING AND RE DOJ CONSULTANT, REVIEW CONSULTANT BACKGROUND	0.20 hrs.	845 /hr.	169.00
07/07/17	NFK	ATTN TO STRATEGY (0.6) - EMAILS DOJ, BUCHWALD, RAM ET AL RE EPA MTG (0.4) - RESEARCH EPA EXPERT GREG BRUSSEAU (0.3)	1.30 hrs.	910 /hr.	1,183.00
07/07/17	DJP	FOLLOW UP COMMUNICATIONS AND PLAN RE MEETING	0.10 hrs.	845 /hr.	84.50
07/08/17	NFK	REVIEW RAM EMAILS RE MTGS, EPA CONSULTANT	0.10 hrs.	910 /hr.	91.00
07/10/17	DJP	RECEIPT AND REVIEW OF EMAILS FROM N RAM RE EXPERTS AND MEETING, FOLLOW UP INTERNET RESEARCH RE EPA EXPERT, PAST EXPERIENCE AND QUALIFICATIONS, APPROACH REGARDING ECONOMIC AND OTHER ISSUES RELATED TO ENVIRONMENTAL LIABILITIES AND SETTLEMENTS, ADDITIONAL COMMUNICATIONS RE EXPERT CONFERENCE CALL	0.70 hrs.	845 /hr.	591.50

07/10/17	NFK	EMAILS RAM, POSCABLO ET AL RE MTG (0.5) - TEL BUCHWALD RE EPA CLAIMS, MTGS, STRATEGY (0.3) - RESEARCH AXLOR CONSULTING AND GAYLE KOCH (0.4) - CONF CP RE STATUS (0.1)	1.30 hrs.	910 /hr.	1,183.00
07/11/17	NFK	EMAILS RAM ET AL RE AGENDA FOR EPA MTG, DOCS	0.50 hrs.	910 /hr.	455.00
07/12/17	DJP	RECEIPT AND REVIEW OF AGENDA FOR CALL AND PREPARE FOR CALL WITH N RAM	0.30 hrs.	845 /hr.	253.50
07/12/17	NFK	EMAILS SHIFF RE RENCO MTG ON ENVIRONMENTAL CLAIMS (0.1) - REVIEW RAM AGENDA AND EMAILS W/ RAM ET AL (0.4) - TEL BUCHWALD RE STRATEGY (0.2) - FOLLOW-UP EMAILS (0.1) - REVIEW RAM AND BG EMAILS RE DOCS (0.2)	1.00 hrs.	910 /hr.	910.00
07/13/17	NFK	REVIEW RAM ET AL EMAILS RE DOCS (0.1) - PREP CONF CALL (0.5) - TELEPHONE CONFERENCE/DISC WITH ROUX PROFS, DJP, BUCHWALD RE STATUS OF INVESTIGATION AND ANALYSIS, EPA MTG PREP (1.1)	1.70 hrs.	910 /hr.	1,547.00
07/13/17	DJP	REVIEW AND PREPARE FOR CONFERENCE CALL AND DISCUSSION WITH EXPERTS RE ENVIRONMENTAL AND COST RELATED ISSUES, DETAILS RE PROGRESS ON SITE ISSUES, OTHER EXPERTS AND RAM APPROACHES, RELATED ISSUES FOR CASE	1.80 hrs.	845 /hr.	1,521.00
07/13/17	DJP	PARTICIPATE IN CONFERENCE CALL WITH ROUX EXPERTS AND CLIENT, CO-COUNSEL, AND DISCUSSION WITH EXPERTS RE ENVIRONMENTAL AND COST RELATED ISSUES, DETAILS RE PROGRESS ON SITE ISSUES, SPECIFIC APPROACHES RE OTHER EXPERTS, NRD STATUS AND RESOURCES IDENTIFIED RE SAME	1.10 hrs.	845 /hr.	929.50
07/14/17	NFK	ATTN TO OPEN ISSUES AND MEMO TO JDA RE RESEARCH [REDACTED] [REDACTED]	1.80 hrs.	910 /hr.	1,638.00
07/16/17	NFK	EMAILS BUCHWALD RE RENCO MEETING	0.10 hrs.	910 /hr.	91.00
07/17/17	DJP	CORRESPONDENCE RE EPA DOCUMENTS AND MEETING	0.10 hrs.	845 /hr.	84.50

07/17/17	DJP	COMMUNICATIONS EPA AND EXPERT AND REVIEW ISSUES AROUND MEETING WITH EPA AND CONSULTANTS	0.10 hrs.	845 /hr.	84.50
07/17/17	DJP	RECEIPT AND BRIEF INITIAL REVIEW OF VOLUMINOUS DOCUMENTS [REDACTED]	1.20 hrs.	845 /hr.	1,014.00
07/17/17	NFK	ATTN TO OPEN ISSUES AND EMAILS DOJ ET AL (1.4) - TEL POSCABLO RE STLMT MTG (0.4) - EMAILS BUCHWALD RE SAME (0.2)	2.00 hrs.	910 /hr.	1,820.00
07/18/17	DJP	RECEIPT AND REVIEW COMMENTS FROM RAM [REDACTED]	0.10 hrs.	845 /hr.	84.50
07/18/17	DJP	REVIEW AND ANALYSIS OF DETAILED DATA AND COST ISSUES RELATED TO SAME FROM DOCUMENTS PROVIDED	1.50 hrs.	845 /hr.	1,267.50
07/18/17	JDA	REVIEW NFK EMAIL RE: ENVIRONMENTAL RESEARCH AND BEGIN RESEARCHING ISSUES [REDACTED]	1.60 hrs.	325 /hr.	520.00
07/19/17	NFK	TEL RAM RE STATUS, ALLEN REPORT (0.2) - EMAILS RAM AND DOJ RE ADD'L DOCS (0.4) - REVIEW RAM EMAIL RE CERCLA (0.1) - CONF DJP RE STRATEGY (0.2) - ATTN TO STRATEGY AND EMAILS W/ BUCHWALD (0.4)	1.30 hrs.	910 /hr.	1,183.00
07/20/17	DJP	RECEIPT OF CORRESPONDENCE FROM DOJ AND OF GOVERNMENT COST SPREADSHEET	0.20 hrs.	845 /hr.	169.00
07/20/17	NFK	REVIEW RAM AND STIRLING EMAILS RE BELTMAN, STACKHOUSE AND STUBBLEFIELD DEPOSITION TESTIMONY (0.1) - REVIEW POSCABLO EMAILS RESPONDING TO MY LIAB QUESTIONS (0.3) - EMAILS RAM, DOJ ET AL RE NRD LIABILITY ESTIMATE, MTG ATTENDEES (0.5) - REVIEW RAM EMAIL RE DAWSON (PRIOR DOJ EXPERT) SALT CAP TESTIMONY (0.1)	1.00 hrs.	910 /hr.	910.00
07/21/17	DJP	COMMUNICATIONS AND REVIEW RE MEETING AND ISSUES TO BE ADDRESSED	0.30 hrs.	845 /hr.	253.50

07/21/17	JDA	CONDUCT LEGAL RESEARCH RE: [REDACTED]	1.60 hrs.	325 /hr.	520.00
07/21/17	JDA	CONTINUE RESEARCHING [REDACTED]	1.40 hrs.	325 /hr.	455.00
07/21/17	NFK	EMAILS RAM, DOJ, BUCHWALD ET AL RE NRD CLAIM, MTG, ATTENDEES, AGENDA, ADD'L DOCS FOR OUR ANALYSIS	1.70 hrs.	910 /hr.	1,547.00
07/24/17	DJP	COMMUNICATIONS EXPERT AND COUNSEL RE EPA PLANNING, RECEIPT AND ANALYSIS OF GENERAL AND THEN DETAILED AGENDA ISSUES FOR DISCUSSION WITH USA, INCLUDING ANALYSIS OF SITE AND PAST ISSUES	3.70 hrs.	845 /hr.	3,126.50
07/24/17	NFK	EMAILS RAM, DOJ, BUCHWALD ET AL RE MTG, AGENDA, DOCS, CLAIM COMPONENTS	1.80 hrs.	910 /hr.	1,638.00
07/25/17	DJP	REVIEW AND PREPARE FOR MEETING WITH EXPERT AND THEN WITH US OFFICIALS	0.60 hrs.	845 /hr.	507.00
07/25/17	JDA	CONDUCT FURTHER RESEARCH [REDACTED]	2.70 hrs.	325 /hr.	877.50
07/25/17	JDA	DRAFT MEMO [REDACTED]	3.80 hrs.	325 /hr.	1,235.00
07/25/17	JDA	CONFER WITH JHH [REDACTED]	0.30 hrs.	325 /hr.	97.50
07/25/17	JDA	FINALIZE AND REVISE MEMO [REDACTED] AND SEND SAME TO NFK.	1.30 hrs.	325 /hr.	422.50
07/25/17	NFK	EMAILS RAM, POSCABLO ET AL RE DOCS (0.6) - TEL RAM RE DOCS (0.1) - ATTN TO STRATEGY AND PREP MTG (0.6) - REVIEW JDA EMAIL [REDACTED] (0.1)	1.40 hrs.	910 /hr.	1,274.00
07/26/17	DJP	ANALYSIS AND PREPARATION FOR MEETING WITH CLIENT, CONSULTANT, AND THEN WITH DOJ, INCLUDING IN REGARD TO NRD ISSUES	3.60 hrs.	845 /hr.	3,042.00

07/26/17	DJP	REVIEW DOCUMENTS AND PREPARE FOR MEETING WITH CLIENT, CONSULTANT RAM, AND MEETING WITH US ATTORNEY AND ITS CONSULTANT	2.80 hrs.	845 /hr.	2,366.00
07/26/17	JDA	FOLLOW UP RESEARCH RE: [REDACTED]	1.50 hrs.	325 /hr.	487.50
07/26/17	JDA	ANALYZE 2ND CIRCUIT CASE LAW RE: INTERSECTION OF BANKRUPTCY CODE AND CERCLA.	2.60 hrs.	325 /hr.	845.00
07/26/17	NFK	EMAILS ROUX, DOJ, BUCHWALD, DJP RE OPEN ISSUES FOR 7/27 MTG, NRD, DOCS (1.5) - REVIEW/ANALYZE EMAILS AND DOCS SENT BY POSCABLO AND RAM RE ENVIRONMENTAL CLAIMS (2.0) - REVIEW RAM MEMO RE TAKEAWAYS FROM REVIEWING DEPOSITION AND TRIAL TRANSCRIPTS (0.4) - REVIEW EPA POC AND PREP 7/27 MTG (1.2) - DRAFT MEMO RE MAGCORP KEY ENVIRONMENTAL ISSUES AND EMAILS BUCHWALD (1.0) - REVIEW JDA MEMO [REDACTED] [REDACTED] (0.7) - EMAILS BUCHWALD RE RESEARCH [REDACTED] [REDACTED] (0.5) - TEL RAM RE PENALTY CLAIMS, MTG ISSUES (0.1) - EMAILS BUCHWALD ET AL RE SAME (0.2) - CONF W/ BUCHWALD RE STRATEGY (0.3)	7.90 hrs.	910 /hr.	7,189.00
07/26/17	DJP	MULTIPLE COMMUNICATIONS REGARDING USA CLAIMS, MEETING ISSUES, DOCUMENTS AND ACCESS TO NRD INFORMATION	0.40 hrs.	845 /hr.	338.00
07/27/17	CP	MEETING W/ NFK, LEB RE: DOJ MEETING	1.20 hrs.	650 /hr.	780.00
07/27/17	DJP	TRAVEL NYC AND PARTICIPATE IN MEETING WITH CLIENT, CONSULTANT RAM, AND MEETING WITH US ATTORNEY AND ITS CONSULTANT, FOLLOWED BY CLIENT AND CONSULTANT FOLLOW-UP MEETING AFTER MEETING WITH USA AND CONSULTANT, DISCUSS NEXT STEPS AND ISSUES ADDRESSED IN MEETING, [REDACTED]	11.20 hrs.	845 /hr.	9,464.00

07/27/17	NFK	EMAILS RAM, POSCABLO ET AL RE MTG, NRD DOCS (0.6) - REVIEW ADD'L DOCS SENT BY RAM AND POSCABLO AND PREP DOJ MTG (1.0) - MTG W/ BUCHWALD, RAM, GERBIG AND DJP TO PREP FOR DOJ MTG (2.5) - TO 86 CHAMBERS FOR MTG W/ DOJ TO DISC ENVIRONMENTAL CLAIMS, AND POST-MTG DEBRIEFING W/ BUCHWALD, RAM, GERBIG AND DJP (5.7)	9.80 hrs.	910 /hr.	8,918.00
07/28/17	DJP	FOLLOW UP COMMUNICATIONS CO-COUNSEL AND EXPERT AND REVIEW AND ANALYSIS OF PENDING ISSUES	1.00 hrs.	845 /hr.	845.00
07/28/17	NFK	REVIEW RAM AND POSCABLO EMAILS RE FOLLOW-UP DOCS (0.6) - ATTN TO STRATEGY IN LIGHT OF 7/27 MTG (0.7) - EMAILS BUCHWALD ET AL RE RENCO MEETING (0.2) - DRAFT EMAIL TO RYAN RE ERM DOCS, RENCO MEETING, SITE VISIT, EMAILS BUCHWALD AND RAM, INCORPORATE THEIR COMMENTS AND FINALIZE AND TRANSMIT EMAIL TO RYAN (1.8) - EMAIL JDA RE CERCLA LIAB (0.2)	3.50 hrs.	910 /hr.	3,185.00
07/29/17	NFK	EMAILS RAM RE FOLLOW-UP	0.10 hrs.	910 /hr.	91.00
07/31/17	DJP	EXPERT COMMUNICATIONS AND REVIEW RE FINANCIAL PROJECTIONS AND DATA ISSUES	0.20 hrs.	845 /hr.	169.00
07/31/17	JDA	CONTINUE RESEARCHING ENVIRONMENTAL CLAIMS ISSUE [REDACTED] CONFER WITH JDD AND LG RE: SAME.	3.70 hrs.	325 /hr.	1,202.50
07/31/17	JDA	DRAFT/REVIEW EMAILS WITH NFK RE: ENVIRONMETAL CLAIMS MEMO.	0.30 hrs.	325 /hr.	97.50
07/31/17	NFK	MSG FROM RAM AND EMAILS RAM ET AL RE ECONOMIC ANALYSIS OF GOVERNMENT'S COST ESTIMATE, ADD'L DOCS, RCRA SETTLEMENT (1.0) - EMAILS JDA [REDACTED] (0.6)	1.60 hrs.	910 /hr.	1,456.00
08/01/17	JDA	CONDUCT LEGAL RESEARCH RE: [REDACTED]	2.90 hrs.	325 /hr.	942.50
08/01/17	JDA	CONFER WITH LGG [REDACTED]	0.30 hrs.	325 /hr.	97.50

08/01/17	NFK	EMAILS RAM ET AL RE PRESENT VALUE, AGENDA, DOCS (0.3) - REVIEW/ANALYZE ERM FINAL INNER PRI DATA REPORT AND OTHER DOCS PROVIDED BY POSCABLO (1.0) - EMAILS JDA RE CERCLA RESEARCH (0.1)	1.40 hrs.	910 /hr.	1,274.00
08/02/17	DJP	PREPARE FOR CONFERENCE CALL WITH EXPERT FROM ROUX ON PRESENT VALUE CALCULATION ISSUES	0.70 hrs.	845 /hr.	591.50
08/02/17	DJP	PARTICIPATE IN CONFERENCE CALL WITH EXPERT FROM ROUX ON PRESENT VALUE CALCULATION ISSUES, AND REGARDING OTHER ROUX EXPERT ISSUES	0.50 hrs.	845 /hr.	422.50
08/02/17	NFK	PREP CONF CALL (0.5) - TELEPHONE CONFERENCE/DISC WITH ROUX REPS ET AL TO DISC EPA EXPERT PRESENT VALUE, ADD'L DOCS (0.5) - TEL SHIFF RE MTG, DOCS, NDA (0.5) - EMAILS RAM ET AL RE SAME (0.2) - CONF BUCHWALD RE STRATEGY (0.5)	2.20 hrs.	910 /hr.	2,002.00
08/03/17	DJP	RECEIPT AND REVIEW OF CORRESPONDENCE FROM N RAM AND N KAJON REGARDING NEWLY ADDED ERM DOCUMENTS ADDED TO EPA ADMINISTRATIVE RECORD, AND OF DRAFT PROPOSED EMAIL TO DOJ REGARDING SAME, NCP COMPLIANCE ISSUE, AND FOLLOW UP WITH N RAM REGARDING SAME, AND REVIEW OF DOCUMENTS IN EPA ADMINISTRATIVE RECORD FOR SITE	0.60 hrs.	845 /hr.	507.00
08/03/17	DJP	REVIEW OF COMPLIANCE OF EPA WITH NATIONAL CONTINGENCY PLAN, [REDACTED] [REDACTED]	1.40 hrs.	845 /hr.	1,183.00
08/03/17	NFK	EMAILS RAM ET AL RE ERM AND OTHER DOCS (0.3) - REVIEW DOCS SENT BY DOJ (0.5)	0.80 hrs.	910 /hr.	728.00
08/04/17	JDA	ANALYZE CERCLA/ENVIRONMENTAL CLAIMS ISSUES WITH L GOLDBERGER.	0.50 hrs.	325 /hr.	162.50
08/04/17	NFK	ATTN TO OPEN ISSUES INCL RENCO MTG AND DOCS	0.40 hrs.	910 /hr.	364.00

08/07/17	NFK	REVIEW/ANALYZE POWELL EXPERT REPORT (1.2) - EMAILS SHIFF AND BUCHWALD RE US MAG DOCS AND MEETING (0.2) - EMAILS BUCHWALD RE SALT CAP (0.1) - REVIEW NEVINS EMAIL RE ESTIMATE FOR ECONOMICS ANALYSIS (0.1) - REVIEW POSCABLO AND RAM EMAILS RE ADMINISTRATIVE RECORD (0.1)	1.70 hrs.	910 /hr.	1,547.00
08/08/17	NFK	EMAIL BUCHWALD RE ROUX ECONOMICS ANALYSIS (0.1) - ATTN TO STRATEGY (0.3) - EMAILS SHIFF ET AL RE 8/29 RENCO MTG (0.2) - TEL SHIFF AND EMAILS TEAM RE RENCO DOCS (0.6)	1.20 hrs.	910 /hr.	1,092.00
08/08/17	DJP	RECEIPT AND ANALYSIS OF INFORMATION RE RETENTION OF ROUX ECONOMIC EXPERT, APPROVAL OF SAME	0.20 hrs.	845 /hr.	169.00
08/08/17	DJP	REVIEW RE RENCO COUNSEL BACKGROUND IN PREPARATION FOR MEETING	0.20 hrs.	845 /hr.	169.00
08/08/17	DJP	COMMUNICATIONS AND REVIEW RE RENCO REQUESTS, AND RE COST ESTIMATES AND DOCUMENTS RE US CLAIM	0.50 hrs.	845 /hr.	422.50
08/08/17	DJP	ANALYSIS OF PENDING ISSUES	0.20 hrs.	845 /hr.	169.00
08/09/17	DJP	REVIEW FOR AND CONFERENCE CALL CLIENT AND EXPERTS, AND FOLLOW UP ISSUES	0.80 hrs.	845 /hr.	676.00
08/09/17	DJP	RECEIPT AND REVIEW OF MULTIPLE ROUX EMAILS AND ATTACHMENTS RE FOLLOW UP QUESTIONS FOR EPA, AGENDA FOR RENCO MEETING, MAG CORP EMAIL	0.50 hrs.	845 /hr.	422.50
08/09/17	JDA	FINISH RESEARCH RE: CERCLA LIABILITY/CUTTING OFF VIA SALE ORDER.	2.60 hrs.	325 /hr.	845.00
08/09/17	JDA	DRAFT/FINALIZE MEMO OF LAW [REDACTED] [REDACTED]	3.20 hrs.	325 /hr.	1,040.00

08/09/17	NFK	REVIEW RAM EMAIL, AGENDA AND OTHER ENVIRONMENTAL DOCS AND PREP FOR CONF CALL (1.5) - EMAILS JDA RE CERCLA RESEARCH (0.1) - TELEPHONE CONFERENCE/DISC WITH RAM, NEVINS, DJP AND BUCHWALD RE DUE DILIGENCE, AGENDAS FOR EPA AND RENCO MTGS (0.4) - FOLLOW-UP EMAILS W/ RAM ET AL (0.4) - DRAFT EMAIL TO POSCABLO RE AUGUST 16 CONFERENCE CALL AGENDA, ATTENDEES, DOCS (0.8) - TEL RAM RE RENCO MTG AGENDA (0.1) - DRAFT AGENDA FOR AUGUST 29 RENCO MEETING (0.3)	3.60 hrs.	910 /hr.	3,276.00
08/10/17	DJP	RECEIPT AND REVIEW [REDACTED]	1.40 hrs.	845 /hr.	1,183.00
08/10/17	JDA	FURTHER REVIEW/REVISE CERCLA MEMO/RESUBMIT TO NFK.	0.40 hrs.	325 /hr.	130.00
08/10/17	NFK	REVIEW/ANALYZE JDA MEMO ON CERCLA, [REDACTED] (1.0) - EMAILS W/ JDA AND DJP RE SAME (0.6) - REVIEW RAM EMAILS REQUESTING DOCS FROM DOJ, RESPONSE TO GOVERNMENT NRD CLAIM (0.3)	1.90 hrs.	910 /hr.	1,729.00
08/11/17	DJP	RECEIPT AND REVIEW OF ROUX ECONOMIC ANALYSIS REGARDING PRESENT VALUE CALCULATIONS ON BEHALF OF EPA	0.30 hrs.	845 /hr.	253.50
08/11/17	DJP	RECEIPT AND REVIEW OF ROUX ANALYSIS OF EPA NRD CLAIMS	0.50 hrs.	845 /hr.	422.50
08/11/17	NFK	EMAILS DJP AND BUCHWALD [REDACTED] (0.6) - ATTN TO STRATEGY [REDACTED] (0.5) - EMAILS BUCHWALD [REDACTED] (0.3) - EMAILS RAM ET AL RE NRD, PRESENT VALUE (0.2) - EMAILS SHIFF AND BUCHWALD RE RENCO/US MAG NDA (0.2) - REVIEW ROUX MEMO ANALYZING POTENTIAL NATURAL RESOURCE DAMAGE CLAIM (0.8)	2.60 hrs.	910 /hr.	2,366.00
08/11/17	DJP	ANALYSIS REGARDING SETTLEMENT AND CERCLA LIABILITY RELATED ISSUES	0.80 hrs.	845 /hr.	676.00

08/14/17	DJP	ANALYSIS, PREPARATION FOR CONFERENCE CALL ROUX AND CLIENT RE NRD CLAIMS, AND PARTICIPATE IN CONFERENCE CALL RE NRD CLAIMS	1.60 hrs.	845 /hr.	1,352.00
08/14/17	DJP	EMAIL EPA RE MEETING, COMMUNICATIONS RE MEETING	0.10 hrs.	845 /hr.	84.50
08/14/17	NFK	REVIEW RAM EMAILS AND PREP FOR CONF CALL (0.4) - TELEPHONE CONFERENCE/DISC WITH RAM, SULLIVAN ET AL RE NATURAL RESOURCE DAMAGE CLAIM, UPCOMING MTGS (0.4) - EMAILS POSCABLO RE OPEN ITEMS FOR 8/16 MTG (0.2) - EMAILS RAM RE SITE VISIT (0.1) - EMAILS BUCHWALD RE OPEN ISSUES (0.2) - REVIEW/REVISE RENCO CONFIDENTIALITY AGREEMENT AND EMAILS BUCHWALD ET AL (0.4) - EMAILS POSCABLO RE RESCHEDULING 8/16 MTG (0.2)	1.90 hrs.	910 /hr.	1,729.00
08/15/17	NFK	EMAILS SCHMIDT, RAM ET AL RE RENCO CONFIDENTIALITY AGREEMENT (0.5) - EMAILS RAM, POSCABLO ET AL RE DOJ MTG (0.5) - EMAILS RAM, ET AL RE PV ANALYSIS (0.1) - EMAILS BUCHWALD RE OPEN ISSUES, STRATEGY (0.3) - REVIEW/ANALYZE ROUX MEMO EVALUATING GOVERNMENT'S PV (0.4) - TELEPHONE CONFERENCE/DISC WITH ROUX ET AL [REDACTED] STRATEGY FOR UPCOMING MTGS (0.7) - FOLLOW-UP EMAILS (0.3) - TEL SCHMIDT AND EMAILS RAM ET AL RE CONFIDENTIALITY AGREEMENT, RENCO MTG, RENCO DOCS (0.4) - ATTN TO STRATEGY (0.4)	3.60 hrs.	910 /hr.	3,276.00
08/15/17	DJP	COMMUNICATIONS EXPERT AND CLIENT, AND REVIEW PENDING LEGAL AND EXPERT ISSUES	0.70 hrs.	845 /hr.	591.50
08/15/17	DJP	RECEIPT AND ANALYSIS OF ROUX PRESENT VALUE DRAFT REPORT [REDACTED] [REDACTED]	0.30 hrs.	845 /hr.	253.50
08/16/17	JDA	REVIEW AND ANALYZE PROOFS OF CLAIM OF EPA/BLM AND UTAH AGENCIES, ORGANIZE SAME INTO CLAIMS CHART.	1.60 hrs.	325 /hr.	520.00
08/16/17	NFK	EMAILS RAM, SCHMIDT, BUCHWALD ET AL RE RENCO CONFIDENTIALITY AGREEMENT, DOCUMENTS, MTG	1.00 hrs.	910 /hr.	910.00
08/17/17	DJP	REVIEW [REDACTED] ISSUES AND CASES	1.40 hrs.	845 /hr.	1,183.00

08/21/17	DJP	MULTIPLE COMMUNICATIONS AND ANALYSIS OF PENDING INVESTIGATION ISSUES	0.70 hrs.	845 /hr.	591.50
08/21/17	JDA	TEL. CALL WITH CP RE: STATUS OF CLAIMS OBJECTIONS AND EMAILS TO NFK RE: SAME.	0.40 hrs.	325 /hr.	130.00
08/21/17	NFK	EMAILS SHIFF, KIRSCH ET AL RE RENCO ENVIRONMENTAL DOCUMENTS	0.40 hrs.	910 /hr.	364.00
08/21/17	DJP	COMMUNICATIONS COUNSEL AND CONSULTANT RE NEW DOCUMENTS	0.10 hrs.	845 /hr.	84.50
08/22/17	NFK	EMAILS JF, KIRSCH ET AL RE RENCO ENVIRONMENTAL DOCUMENTS (1.0) - EMAILS POSCABLO ET AL RE 9/19 MTG (0.2) - ATTN TO OPEN ISSUES (0.6)	1.80 hrs.	910 /hr.	1,638.00
08/23/17	NFK	EMAILS NEVINS, BUCHWALD, KIRSCH ET AL RE RENCO ENVIRONMENTAL DOCUMENTS (1.0) - ATTN TO OPEN ISSUES (0.5) - EMAILS SCHMIDT ET AL RE RENCO ATTENDEES (0.2)	1.70 hrs.	910 /hr.	1,547.00
08/24/17	NFK	EMAILS BUCHWALD ET AL RE SCS ENGINEERS (0.1) - REVIEW POWELL REPORT AND OTHER KEY DOCS TO PREP FOR RENCO MTG (1.0) - EMAILS RAM ET AL RE MEETING WITH RENCO (0.3)	1.40 hrs.	910 /hr.	1,274.00
08/25/17	NFK	EMAILS KIRSCH ET AL RE RENCO DOCS (0.3) - TEL BUCHWALD RE RENCO MTG (0.1)	0.40 hrs.	910 /hr.	364.00
08/26/17	NFK	EMAILS KIRSCH ET AL RE RENCO MTG	0.10 hrs.	910 /hr.	91.00
08/28/17	DJP	ADDITIONAL ANALYSIS AND PARTICIPATE IN CONFERENCE RE PREPARATION FOR RENCO MEETING AND RELATED ISSUES	0.90 hrs.	845 /hr.	760.50
08/28/17	DJP	ADDITIONAL REVIEW AND PREPARATION FOR RENCO MEETING AND PRE-MEETING WITH CLIENT AND CONSULTANT	1.60 hrs.	845 /hr.	1,352.00
08/28/17	DJP	REVIEW LEGAL AND TECHNICAL ISSUES AND INFORMATION FROM CONSULTANTS, AND PREPARE FOR CONFERENCES CLIENT, CLIENT CONSULTANTS, AND RENCO COUNSEL AND CONSULTANT	3.30 hrs.	845 /hr.	2,788.50

08/28/17	NFK	EMAILS RAM, KIRSCH, BUCHWALD, DJP ET AL RE OPEN ISSUES, RENCO MTG, DOCS, AGENDA (1.3) - TELEPHONE CONFERENCE/DISC WITH RAM, BUCHWALD ET AL RE OPEN ISSUES, RENCO MTG (0.3) - 2 TELS BUCHWALD RE OPEN ISSUES, RENCO MTG, STRATEGY (0.3) - PREP RENCO MTG (1.5)	3.40 hrs.	910 /hr.	3,094.00
08/29/17	DJP	PREPARATION, TRAVEL, PARTICIPATE IN MEETING WITH CLIENT, ENVIRONMENTAL CONSULTANTS, CO-COUNSEL, AND MEETING WITH RENCO COUNSEL, RENCO ENVIRONMENTAL CONSULTANT AND GENERAL COUNSEL, AND FOLLOW UP MEETING CLIENT, CONSULTANTS AND CO-COUNSEL	12.70 hrs.	845 /hr.	10,731.50
08/29/17	NFK	PREP RENCO MTG (1.5) - MTGS W/ BUCHWALD, RAM, GERBIG AND DJP TO DISC STATUS AND PREP RENCO MTG (2.4) - TO KASOWITZ W/ BUCHWALD, RAM, GERBIG AND DJP FOR MTG W/ RENCO GROUP REPS RYAN, KIRSCH AND RAFFMAN FROM GOODWIN, AND US MAG'S CONSULTANT MIKE MC LAUGHLIN OF SCS ENGINEERS TO DISC ENVIRONMENTAL CLAIMS; POST-MTG DISC W/ OUR TEAM TO DISC PROGRESS, NEXT STEPS (3.8)	7.70 hrs.	910 /hr.	7,007.00
08/30/17	DJP	REVIEW AND ANALYSIS RE REQUESTS TO RENCO, OTHER FOLLOW UP ISSUES RE LEGAL CLAIMS	0.40 hrs.	845 /hr.	338.00
08/30/17	DJP	RECEIPT AND REVIEW OF MULTIPLE COMMUNICATIONS AND NEW INFORMATION FROM N RAM	1.10 hrs.	845 /hr.	929.50
08/30/17	DJP	COMMUNICATIONS N RAM AND COUNSEL RE DETAILED FOLLOW UP ISSUES	0.40 hrs.	845 /hr.	338.00
08/30/17	DJP	MULTIPLE COMMUNICATIONS AND DOCUMENT REVIEW ISSUES	0.80 hrs.	845 /hr.	676.00
08/30/17	NFK	FOLLOW-UP TO RENCO MEETING (0.6) - EMAILS RAM, KIRSCH ET AL RE ADD'L DOCS REQUESTED FROM RENCO (1.0) - EMAILS RAM ET AL RE GIS FILES, ADD'L DOCS REQUESTED FROM DOJ (0.3) - EMAIL SHIFF RE MEETING (0.1) - ATTN TO STRATEGY, CONTRIBUTION CLAIM (0.5)	2.50 hrs.	910 /hr.	2,275.00
08/31/17	DJP	MULTIPLE COMMUNICATIONS N RAM AND DOCUMENT REVIEW ISSUES	0.20 hrs.	845 /hr.	169.00

08/31/17	DJP	REVIEW FOLLOW REQUESTS RENCO, REVIEW OTHER PENDING ISSUES	1.00 hrs.	845 /hr.	845.00
08/31/17	NFK	REVIEW POSCABLO AND RAM EMAILS RE ADD'L DOCS AND INFO FROM EPA	0.40 hrs.	910 /hr.	364.00
09/01/17	DJP	RECEIPT AND REVIEW OF KAJON DETAILED REQUEST TO RENCO FOR ADDITIONAL INFORMATION	0.10 hrs.	845 /hr.	84.50
09/01/17	DJP	REVIEW NATURAL RESOURCE DAMAGES COMPONENTS AND ISSUES, FOR FURTHER ASSESSMENT OF CLAIMS	0.40 hrs.	845 /hr.	338.00
09/01/17	NFK	EMAILS RAM ET AL RE MTG W/ REGION 8 EPA OFFICE (0.1) - EMAILS RAM, KIRSCH ET AL RE ADD'L DOCS FROM RENCO FOLLOWING REVIEW OF GIS FILES (0.5)	0.60 hrs.	910 /hr.	546.00
09/05/17	DJP	REVIEW STATUS AND PENDING ISSUES	0.40 hrs.	845 /hr.	338.00
09/05/17	NFK	CONF CP RE STATUS (0.1) - REVIEW/ANALYZE DOCS SENT BY DOJ (1.2)	1.30 hrs.	910 /hr.	1,183.00
09/06/17	NFK	EMAILS POSCABLO, RAM ET AL RE EPA DOCS AND INFO (0.3) - PREP CONF CALL (0.3) - TELEPHONE CONFERENCE/DISC WITH RAM ET AL RE EPA DOCS, AGENDA (0.2) - FOLLOW-UP EMAILS (0.1)	0.90 hrs.	910 /hr.	819.00
09/06/17	DJP	REVIEW EPA AND DOJ ISSUES AND PREPARE FOR CONFERENCE CALL, PARTICIPATE IN CALL	0.60 hrs.	845 /hr.	507.00
09/07/17	CP	REVIEW UPDATED CLAIMS ANALYSIS CHART RE: EPA, UTAH STATE CLAIMS	0.30 hrs.	650 /hr.	195.00
09/07/17	JDA	REVIEW EMAILS FROM NFK RE: TABLE OF EPA CLAIMS; REVISE AND RE-SEND TABLE TO REFLECT GREATER DETAIL RE: EACH CLAIM.	0.70 hrs.	325 /hr.	227.50
09/07/17	NFK	EMAILS RAM ET AL RE EPA DOCS (0.1) - EMAILS RAFFMAN, ROUX ET AL RE RENCO DOCS, SITE VISIT (0.4)	0.50 hrs.	910 /hr.	455.00

09/07/17	DJP	RECEIPT AND ANALYSIS OF RENCO RESPONSES TO DETAILED REQUESTS FOR INFORMATION, AND RECEIPT AND ANALYSIS OF MULTIPLE DOCUMENTS PROVIDED BY RENCO, INCLUDING CONSENT ORDERS AND RELATED DOCUMENTS	1.50 hrs.	845 /hr.	1,267.50
09/08/17	NFK	MANY EMAILS BUCHWALD, RAM, DJP ET AL RE SITE VISIT	1.00 hrs.	910 /hr.	910.00
09/11/17	NFK	TELEPHONE CONFERENCE/DISC WITH RAM, NEVINS RE SITE VISIT (0.1) - REVIEW RENCO DOCS (0.5) - REVIEW POSCABLO EMAIL RE TOEROECK REPORT, BLM'S COSTS, WANGERUD (0.1) - ATTN TO STRATEGY (0.3)	1.00 hrs.	910 /hr.	910.00
09/12/17	DJP	PREPARE FOR CONFERENCE CALL WITH N RAM AND STAFF, CLIENT REGARDING PENDING ISSUES AND PLANNING FOR DOJ MEETING	0.20 hrs.	845 /hr.	169.00
09/12/17	DJP	PARTICIPATE IN CONFERENCE CALL WITH N RAM AND STAFF, CLIENT REGARDING PENDING ISSUES AND PLANNING FOR DOJ MEETING	0.40 hrs.	845 /hr.	338.00
09/12/17	NFK	PREP CONF CALL (0.3) - TELEPHONE CONFERENCE/DISC WITH ROUX ASSOCIATES, BUCHWALD, PARSELLS TO PREP FOR 9/19 CONFERENCE CALL W/ EPA (0.4) - EMAIL POSCABLO ET AL RE AGENDA FOR 9/19 EPA CONFERENCE CALL (0.3) - TEL BUCHWALD RE SITE VISIT (0.1)	1.10 hrs.	910 /hr.	1,001.00
09/13/17	DJP	COMMUNICATIONS AND PLANNING REGARDING SITE VISIT ISSUES	0.40 hrs.	845 /hr.	338.00
09/13/17	DJP	ADDITIONAL COMMUNICATIONS AND TRAVEL INVESTIGATION	0.80 hrs.	845 /hr.	676.00
09/13/17	DJP	COMMUNICATIONS AND ISSUE REVIEW RE DOJ CHANGES TO PROPOSED CONFERENCE CALL, REACTIONS AND STRATEGIES GOING FORWARD	0.30 hrs.	845 /hr.	253.50
09/13/17	NFK	ATTN TO STRATEGY (0.6) - EMAILS RAFFMAN, BUCHWALD, RAM ET AL RE ROWLEY FACILITY SITE VISIT (0.8) - EMAILS POSCABLO, RAM ET AL RE DOJ RESPONSE, 9/19 CALL, WITNESSES, DOCS (0.4) - ATTN TO DOJ DELAYS (0.2) - CONF BUCHWALD RE SAME (0.2)	2.20 hrs.	910 /hr.	2,002.00

09/14/17	DJP	ANALYSIS AND PLANNING RE DOJ CALL ISSUES, AND REGARDING SITE VISIT AND ARRANGEMENTS, AND MULTIPLE COMMUNICATIONS EXPERT AND CLIENT, AND WITH DOJ	1.30 hrs.	845 /hr.	1,098.50
09/14/17	DJP	REVIEW OF NATURAL RESOURCE DAMAGES LEGAL COMPONENTS AND ISSUES IN PREPARATION FOR DOJ AND EXPERTS' CONFERENCE CALL	1.00 hrs.	845 /hr.	845.00
09/14/17	NFK	EMAILS BUCHWALD ET AL RE SITE VISIT (0.3) - ATTN TO EPA STRATEGY AND EMAILS DJP, BUCHWALD ET AL RE SAME (1.0) - EMAILS DJP, POSCABLO ET AL RE 9/19 CALL, ADMIN AND PENALTY CLAIMS (0.5)	1.80 hrs.	910 /hr.	1,638.00
09/15/17	NFK	ATTN TO [REDACTED] [REDACTED] AND EMAILS DJP AND BUCHWALD (1.4) - REVIEW RAM EMAIL [REDACTED] [REDACTED] (0.1) - REVIEW [REDACTED] [REDACTED] (0.1) - EMAILS DJP [REDACTED] (0.1)	1.70 hrs.	910 /hr.	1,547.00
09/15/17	DJP	ANALYSIS AND COMMUNICATIONS CO-COUNSEL RE LIABILITY ISSUES	0.90 hrs.	845 /hr.	760.50
09/15/17	DJP	COMMUNICATIONS CO-COUNSEL RE LANGUAGE FOR COURT FILING	0.30 hrs.	845 /hr.	253.50
09/18/17	CP	ANALYZE & EMAIL NFK BREAKDOWN OF ESTIMATED CLAIM AMOUNTS FOR TRADE VENDORS, PBGC, INSIDERS, FOR SETTLEMENT DISCUSSIONS W/ EPA	2.30 hrs.	650 /hr.	1,495.00
09/18/17	DJP	COMMUNICATIONS EXPERTS' MUTIPLE ADDITIONAL DOCUMENTS AND REVIEW SAME AND ISSUES FOR CONFERENCE CALL WITH DOJ AND ITS EXPERT	2.70 hrs.	845 /hr.	2,281.50
09/18/17	DJP	REVIEW SUMMARY OF STATUS OF ISSUES	0.30 hrs.	845 /hr.	253.50
09/18/17	NFK	EMAILS RAM, KIRSCH ET AL RE US MAG DOCS	0.30 hrs.	910 /hr.	273.00
09/18/17	DJP	REVIEW TALKING POINTS AND RELATED ISSUES AND PREPARE FOR HOSTING CONFERENCE CALL WITH EXPERTS AND DOJ	1.50 hrs.	845 /hr.	1,267.50
09/19/17	DJP	REVIEW AND PREPARE FOR HOSTING MAG CORP CALL WITH DOJ AND EXPERTS	0.60 hrs.	845 /hr.	507.00

09/19/17	DJP	PARTICIPATE IN CONFERENCE CALL WITH EXPERTS AND DOJ, AND FOLLOW UP CALL WITH CLIENT AND EXPERTS, CORRESPONDENCE WITH N RAM, CO-COUNSEL, CLIENT, US ATTORNEY, RECEIPT AND REVIEW OF DOCUMENTS FROM US ATTORNEY	2.40 hrs.	845 /hr.	2,028.00
09/19/17	NFK	MANY EMAILS W/ POSCABLO, DJP, RAM AND BUCHWALD RE CONF CALL RESULTS, PV, NRD CLAIM, OTHER ENVIRONMENTAL CLAIMS, REVIEW PROCESS, DOCS	1.00 hrs.	910 /hr.	910.00
09/20/17	CP	REVIEW & REVISE NFK EMAIL TO EPA	0.20 hrs.	650 /hr.	130.00
09/20/17	DJP	RECEIPT AND REVIEW OF CORRESPONDENCE FROM DOJ REGARDING AIR MONITORING EQUIPMENT, GAS MASKS AND ISSUES RE SITE VISIT, AND FOLLOW UP WITH ENVIRONMENTAL CONSULTANT ON EQUIPMENT AND PROTECTIVE GEAR ISSUES	0.40 hrs.	845 /hr.	338.00
09/20/17	DJP	REVIEW STATUS AND GLOBAL SCOPE OF BANKRUPTCY ISSUES PENDING IN CASE, AND RESOLUTION REQUIRED PER CO-COUNSEL ANALYSIS AND COMMUNICATIONS DOJ RE DISCUSSION OF SAME	0.40 hrs.	845 /hr.	338.00
09/20/17	JDA	EXCHANGE EMAILS WITH NFK AND CP RE: STATUS/EXTENT OF EPA CLAIMS AND STATUS REPORT IN UTAH DISTRICT COURT CASE/CHECK DOCKET RE: SAME.	0.40 hrs.	325 /hr.	130.00
09/20/17	NFK	EMAILS RAM ET AL RE ADD'L DOCS FROM DOJ (0.2) - EMAILS RAFFMAN ET AL RE SITE VISIT (0.1) - TEL BUCHWALD RE EPA CLAIMS (0.1) - EMAILS HAIN RE EPA CLAIMS (0.1) - ATTN TO ENVIRONMENTAL CLAIMS AND EMAILS CP AND JDA (0.5)	1.00 hrs.	910 /hr.	910.00
09/20/17	DJP	RECEIPT AND REVIEW OF EXTENDED ANALYSIS PROVIDED TO US GOVERNMENT IN RESPONSE TO REQUESTS AS TO DETAILED BANKRUPTCY ISSUES AND ENVIRONMENTAL COSTS, COMPETING CLAIMS, RELATED ISSUES, AND RESEARCH RE BACKGROUND	1.00 hrs.	845 /hr.	845.00
09/21/17	CP	EMAILS W/ NFK, JDA RE: DETAILING NATURE OF EPA CLAIMS (0.3) - REVIEW TRIAL TRANSCRIPTS EXPERT REPORTS, EMAILS W/ NFK RE: RESPECTIVE EXPERTS' CALCULATIONS OF POTENTIAL ENVIRONMENTAL LIABILITY (2.5)	2.80 hrs.	650 /hr.	1,820.00

09/21/17	NFK	EMAILS POSCABLO AND DJP RE NRD CLAIM (0.2) - REVIEW ALLEN AND POWELL EXPERT REPORTS (0.5) - EMAILS CP RE EXPERT TESTIMONY ON ENVIRONMENTAL LIABILITIES (0.2) - EMAILS DJP AND RAM RE DEBTOR'S CONTRIBUTION CLAIM (0.1)	1.00 hrs.	910 /hr.	910.00
09/21/17	DJP	RECEIPT OF CORRESPONDENCE DOJ AND CO-COUNSEL RE MEETING, AND FURTHER REVIEW ISSUES FOR DISCUSSION	0.80 hrs.	845 /hr.	676.00
09/21/17	DJP	COMMUNICATIONS CO-COUNSEL AND EXPERT INCLUDING TIMING ISSUES, AND INCLUDING ALLOCATION ANALYSIS DEVELOPMENT BY ROUX, REVIEW LEGAL ISSUES RELATED TO CLAIMS	3.00 hrs.	845 /hr.	2,535.00
09/22/17	CP	REVIEW TRIAL TRANSCRIPTS EXPERT REPORTS, EMAILS W/ NFK RE: RESPECTIVE EXPERTS' CALCULATIONS OF POTENTIAL ENVIRONMENTAL LIABILITY (1.0) - READ JDA MEMO DETAILING EPA CLAIMS AGAINST DEBTORS (0.3)	1.30 hrs.	650 /hr.	845.00
09/22/17	DJP	REVIEW CLAIMS AND RELATED LEGAL ISSUES	0.70 hrs.	845 /hr.	591.50
09/22/17	JDA	REVIEW AND ANALYZE US ENVIRONMENTAL CLAIMS AGAINST DEBTORS AND DRAFT SUMMARY MEMO RE: SAME TO NFK/CP.	2.80 hrs.	325 /hr.	910.00
09/22/17	JDA	CONTINUE DRAFTING/FINALIZE MEMO RE: ENVIRONMENTAL CLAIMS.	0.90 hrs.	325 /hr.	292.50
09/22/17	NFK	EMAILS CP AND STIRLING RE ENVIRONMENTAL LIABILITIES, TRIAL TESTIMONY (0.4) - EMAILS RAM ET AL RE DUE DILIGENCE TIMETABLE, ADD'L DOCS (0.8) - REVIEW/REVISE INSERT ON ENVIRONMENTAL LIABILITIES FOR INCLUSION IN VARIOUS PLDGS (1.2)	2.40 hrs.	910 /hr.	2,184.00
09/23/17	NFK	EMAIL KIRSCH ET AL RE FOLLOWING UP ROUX DOC REQUESTS	0.10 hrs.	910 /hr.	91.00
09/24/17	NFK	EMAILS RAM ET AL RE TIMELINE	0.10 hrs.	910 /hr.	91.00
09/25/17	CP	CONF CALL W/ ROUX ASSOCIATES, NFK, RE: MAGCORP SITE VISIT	0.60 hrs.	650 /hr.	390.00

09/25/17 DJP

ANALYSIS OF LEGAL ISSUES [REDACTED]

BE

ADDED TO ROUX FOUNDATIONAL WORK FOR ATTEMPTED COMPLETE NEGOTIATION OF ALL LIABILITY AND ALLOCATION ISSUES WITH RENCO, INCLUDING AMPLIFICATION OF ROUX CURRENT WORK SCOPE

1.60 hrs. 845 /hr. 1,352.00

09/25/17 DJP

COMMUNICATIONS EXPERT AND REVIEW OF DEVELOPING ISSUES

0.60 hrs. 845 /hr. 507.00

09/25/17 NFK

REVIEW JDA MEMO RE ENVIRONMENTAL LITIGATION AND PROOFS OF CLAIM (0.4) - EMAILS JDA AND CP RE SAME (0.2) - REVIEW/REVISE INSERT RE ENVIRONMENTAL CLAIMS (1.3) - CONF CP RE TIMELINE (0.1) - TELEPHONE CONFERENCE/DISC WITH RAM ET AL RE TIMELINE, SITE VISIT, DOCS, ALLOCATION, DIVISIBILITY (0.6) - EMAILS RAFFMAN ET AL RE RENCO DOCS (0.3) - EMAILS BUCHWALD ET AL RE SITE VISIT (0.2)

3.10 hrs. 910 /hr. 2,821.00

09/25/17 DJP

PREPARE FOR AND PARTICIPATE IN CONFERENCE CALL WITH ROUX, CLIENT AND CO-COUNSEL RE SITE VISIT, VARIOUS PENDING ISSUES, ADDITIONAL ALLOCATION RELATED WORK, PROTECTIVE EQUIPMENT, ETC.

1.10 hrs. 845 /hr. 929.50

09/25/17 JDA

REVIEW/RESPOND TO NFK EMAILS RE: ENVIRONMENTAL CLAIMS AGAINST DEBTORS' ESTATES.

0.40 hrs. 325 /hr. 130.00

09/26/17 DJP

RECEIPT AND REVIEW OF VOLUMINOUS RENCO FILES REGARDING SITE ISSUES, AND INVESTIGATION OF INFORMATION AVAILABLE ON EPA SITE, DOCUMENT LINKS, ANALYSIS OF POTENTIAL NRD AND REMEDIAL ISSUES, ALLOCATION BASES

6.20 hrs. 845 /hr. 5,239.00

09/26/17 NFK

REVIEW EPA POC (0.3) - REVIEW/REVISE ENVIRONMENTAL INSERT (0.5) - CONF BUCHWALD RE ENVIRONMENTAL CLAIMS, SITE VISIT (0.2)

1.00 hrs. 910 /hr. 910.00

09/27/17 NFK

REVIEW RAM DRAFT AGENDA FOR OCT 18 SITE INSPECTION AND LIST OF OUTSTANDING INFO AND DOC REQUESTS, FOLLOW UP (0.3) - EMAILS RAFFMAN ET AL RE SITE INSPECTION, LOGISTICS (0.5) - ATTN TO ENVIRONMENTAL CLAIMS, STRATEGY (0.4)

1.20 hrs. 910 /hr. 1,092.00

09/27/17 DJP ANALYSIS OF CLAIMS, AND EDITING OF REPORT ON
STATUS, FURTHER REVIEW OF RECORDS AND
ENVIRONMENTAL ISSUES

		3.50 hrs.	845 /hr.	2,957.50	
09/28/17	DJP	REVIEW SITE INFORMATION AND AREAS OF CONCERN FOR PLANNED VISIT	1.00 hrs.	845 /hr.	845.00
		TOTAL FEES	409.40 hrs.		\$333,463.00

EXPENSES:

05/01/17	NICHOLAS F KAJON: TRAIN/AMTRAK T/F NY PENN/BOSTON FOR MTG	\$276.00
05/02/17	NICHOLAS F KAJON: DINNER I NBOSTON W/BUCHWALD & PARSELLS	\$410.70
05/02/17	DAVID J PARSELLS: AMTRAK TICKET T/F BOSTON FOR MTG W/CLIENT	\$516.00
05/02/17	NICHOLAS F KAJON: HOTEL/BOSTON TRIP	\$990.23
05/02/17	NICHOLAS F KAJON: TAXIS-BOSTON TRIP	\$88.85
05/02/17	DAVID J PARSELLS: LIBERTY HOTEL STAY FOR MTG W/N RAM & L BUCHWALD - WOBURN, MA RE MAGCORP ENVIRONMENTAL CLAIMS	\$967.11
05/03/17	NICHOLAS F KAJON: BOSTON TRIP MEALS	\$21.44
05/04/17	WESTLAW	\$42.30
05/04/17	WESTLAW	\$136.09
05/10/17	AVANT BUSINESS SERVICES: DELIVERY	\$16.35
06/29/17	NICHOLAS F KAJON: DINNER W/LEE BUCHWALD	\$96.05
06/29/17	NICHOLAS F KAJON: TAXI/MTG	\$15.38
07/13/17	NICHOLAS F KAJON: TAXI/DINNER W/BUCHWALD	\$12.85
07/13/17	NICHOLAS F KAJON: DINNER W/LEE BUCHWALD	\$73.46
07/25/17	WESTLAW	\$41.16
07/25/17	WESTLAW	\$125.00
07/25/17	DAVID J PARSELLS: AMTRAK TICKET TO NYC FOR MTG W/LEE BUCHWALD	\$135.00
07/26/17	NICHOLAS F KAJON: DINNER W/LEE BUCHWALD	\$40.76
07/27/17	DAVID J PARSELLS: 42 MI T/F TRAIN STATION FOR MTG IN NYC W/L BUCHWALD	\$22.47
07/27/17	BLAKE & TODD: LUNCH MTG	\$78.37
07/27/17	NICHOLAS F KAJON: POST DEPT. OF JUSTICE MTG SNACK W/NEIL RAM, CHASE GERBIG, LEE BUCHWALD & DJP	\$120.34
07/27/17	DAVID J PARSELLS: TOLLS FOR MTG IN NYC	\$4.47
07/27/17	DAVID J PARSELLS: SUBWAY IN NYC FOR MTG W/L BUCHWALD	\$6.00

EXPENSES:

07/27/17	NICHOLAS F KAJON: TRAIN & TAXI/FOR RAM, GERBIG, DJP & NFK TO DEPT. OF JUSTICE MTG	\$32.50
07/31/17	WESTLAW	\$62.12
08/02/17	WESTLAW	\$6.16
08/09/17	WESTLAW	\$24.63
08/29/17	DAVID J PARSELLS: TRAVEL 42 MI (\$22.47) T/F TRAIN STATION FOR MTG IN NYC W/LEE BUCHWALD/TOLLS-\$4.47 & TICKET-\$90	\$22.47
08/29/17	BLAKE & TODD: LUNCH MTG	\$83.76
08/29/17	NICHOLAS F KAJON: DINNER AFTER RENCO MTG W/NEIL RAM, CHASE GERBIG, DJP, NFK & LEE BUCHWALD	\$117.14
08/29/17	BLAKE & TODD: NFK LUNCH MTG	\$83.76
08/29/17	DAVID J PARSELLS: TOLLS FOR MTG IN NYC W/BUCHWALD	\$4.47
08/29/17	DAVID J PARSELLS: AMTRAK TICKET FROM TRENTON NJ TO NYC FO RMTG W/L BUCHWALD	\$90.00
08/29/17	NICHOLAS F KAJON: TAXI/CARFARE	\$14.10
08/31/17	FIRMEX DATAROOM - AUGUST 2017	\$18.94
09/14/17	NICHOLAS F KAJON: FLIGHT T/F SALT LAKE CITY, UT	\$704.40
09/15/17	DAVID J PARSELLS: FLIGHT F/F SALT LAKE CITY, UT	\$604.40
09/30/17	FIRMEX DATAROOM - SEPTEMBER 2017	\$18.39
09/30/17	COMPUTER RESEARCH	\$17.10
09/30/17	DOCUMENT REPRODUCTION	\$444.00
09/30/17	FEDERAL EXPRESS	\$9.27
09/30/17	TELEPHONE CHARGES.	\$64.33
09/30/17	POSTAGE	\$137.20
	TOTAL EXPENSES	\$6,795.52

BILLING SUMMARY

TOTAL FEES	\$333,463.00
TOTAL EXPENSES	\$6,795.52
TOTAL OF THIS BILL	\$340,258.52
NET BALANCE FORWARD	\$12,951.60
TOTAL BALANCE DUE	\$353,210.12

STEVENS & LEE
P. O. BOX 679
READING, PA 19603-0679
PHONE: 610-478-2000 FAX: 610-376-5610
FEDERAL I.D. #23-1886296

October 17, 2017
Billed through 09/30/17

Invoice Number: 492661 NFK

LEE E BUCHWALD TRUSTEE
BUCHWALD CAPITAL ADVISORS LLC
420 LEXINGTON AVENUE SUITE 300
NEW YORK NY 10170

MAGNESIUM CORP./ENVIRONMENTAL 070187-00003

Balance Forward	\$12,951.60
Payments and Adjustments made since last invoice	\$0.00
Net Balance Forward	\$12,951.60

BILLING SUMMARY

TOTAL FEES	\$333,463.00
------------	--------------

TOTAL EXPENSES	\$6,795.52
----------------	------------

TOTAL OF THIS BILL	\$340,258.52
---------------------------	---------------------

NET BALANCE FORWARD	\$12,951.60
---------------------	-------------

TOTAL BALANCE DUE	\$353,210.12
--------------------------	---------------------